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November 17, 2022

Via ECF

Honorable Naomi Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Laurell Wells
Ind. # 20 Cr. 633 (NRB)

Dear Judge Buchwald:

Mr. Wells has sent another pro-se letter to the Court, dated October 29, 2022, (Docket # 93), and it was forward to our office by Ms. Lesavage on November 16, 2022. The letter is titled "Requesting my attorney to file an illegal search and seizure motion[.]"

The crux of Mr. Wells' application is based on his review of the extractions obtained from the phones searched as a result of the search warrants in question. On November 10, 2022, the government supplied us with flash drives containing the extractions. There have been technical issues opening the extractions, however, and, although we have been working to resolve them, as yet, have not had success.

Currently the Court's motion schedule requires that our Reply Brief be filed on December 2, 2022. We believe that, in lieu of a Reply Brief, the way in which we can best respect Mr. Wells' request is to file a Supplemental Motion addressing the issues he raises in his letter to the Court. In order to accomplish this, we need to review the complete extractions to which Mr. Wells refers. It is with this in mind, that we are respectfully requesting additional time to access the flash drives provided by the government and file a supplemental motion as Mr. Wells has requested. We are respectfully requesting December 21, 2022, or whatever time the Court deems appropriate.

We have reached out to the government inquiring if they have any objection to this request, but have not yet received a response.

Thank you for your consideration.

Respectfully submitted,

SULLIVAN | BRILL, LLP
Attorneys for Mr. Wells

A handwritten signature in black ink, appearing to read "James Healy", written over a horizontal line.

By: James Healy